

August 17, 2005

Mr. Jay Manning, Director
Washington State Department of Ecology (DOE)
P.O. Box 47600
Olympia, WA 98504-7600

Re: Draft NPDES Phase II Stormwater Permit and Rule

Mr. Manning,

My name is Daren Baysinger. Among other responsibilities, I am in charge of coordinating NPDES Phase II implementation for the City of Redmond. I am writing to express our support for the Draft NPDES Phase II Stormwater Permit. I encourage you to be steadfast in keeping the integrity of the permit intact and follow through with timely implementation. Additionally, I am writing for other specific reasons outlined below.

First and foremost, it is important to state that the City of Redmond does not support the letter drafted to you on behalf of the Association of Washington Cities. Contrary to that which is implied by the letter, the City of Redmond does not share the same level of concern over the proposed permit requirements.

Instead, Redmond is encouraged that the permit includes performance-based monitoring, testing and reporting requirements, and specific implementation deadlines. We see these permit criteria as being natural and evolutionary extensions of Ecology's previous Comprehensive Stormwater Program Requirements, *which were to have been implemented by communities in the region in the mid-1990's*.

Over the last 10 years Redmond has pro-actively developed and implemented comprehensive stormwater management programs/policies. Rather than waiting for the inevitable, Redmond implemented a flow/water quality/biological monitoring program, with most components of this program active for the last 5-plus years. In fact, much of our data is being used to work on a regional level with Ecology and King County for NPDES, TMDL, and ESA related issues.

As a result, we look forward to being on the frontline of the environmental compliance effort and continuing our work with Ecology to learn more from the data we are collecting about our programs. Thus, we will continue to adaptively manage our environmental programs for fiscal responsibility, beneficial environmental results, and regulatory compliance.

Once again, we see the intent of the language contained in the draft NPDES Phase II permit as a great step forward. We think it provides the necessary platform for taking action crucial to protecting and enhancing the ecological conditions in our region, as intended by the Clean Water Act - enacted so many years ago.

Sincerely,

Daren D. Baysinger
Environmental Compliance Manager